CITY OF PORTLAND
ENVIRONMENTAL SERVICES

1120 SW Fifth Avenue, Room 1000, Portland, Oregon 97204 ▪ Nick Fish, Commissioner ▪ Michael Jordan, Director

October 1, 2015

Jim Orr
Oregon Department of Environmental Quality
Northwest Region Cleanup Program
700 NE Multnomah St., Suite #600
Portland, OR 97232

Subject: Stormwater Source Control Evaluation Work Plan for the Former Mt. Hood Solutions Warehouse Site (ECSI #81)

Dear Jim:

The City reviewed the Stormwater Source Control Evaluation Work Plan for the Former Mt. Hood Solutions Warehouse Site, dated September 8, 2015, and prepared by Geodesign, Inc. This site discharges to the Willamette River via the municipal stormwater conveyance system affiliated with Outfall 19. The City offers the following comments for your consideration, in accordance with the joint objectives of the Intergovernmental Agreement between DEQ and the City for identifying and evaluating potential contaminant sources to the City's stormwater collection system in Portland Harbor.

1. City and DEQ comments on a previous Site work plan (dated September 17, 2012) both requested documentation of the 2011 cleaning of the North Private Line mentioned in that plan. Section 2.2 of the current work plan indicates that cleaning of the North Private Line reportedly occurred, but no documentation has been provided to verify this statement or to clarify which portions of the shared private system were cleaned. This is an important consideration for the City and the Site source control evaluation (SCE). As noted in a March 4, 2008 letter from the City to DEQ, the City collected and analyzed inline solids from the North Private Line at the connection to the municipal storm system and found elevated concentrations of metals[1] that were more than ten times the DEQ/EPA Portland Harbor screening level values (SLVs) for stormwater solids. Documentation of line cleaning is needed to verify that legacy contaminated solids that were discharged to this multiparty private line have been removed.

2. Contaminants of interest listed in Section 3.3 are stated to be consistent with detections in Basin 19, but do not include arsenic and silver. The City detected both metals in North Private Line inline solids at concentrations more than ten times the SLVs. These metals, and total suspended solids for data evaluation, should be added to the analytical scope.

[1] BES. 2010. Source Investigation Update Report. City of Portland Outfall Basin 19. City of Portland, Bureau of Environmental Services. June 2010.

3. Clarification is needed in Sections 4.3 and 4.4 on the proposal for collection and analysis of stormwater solids from the site storm system. The first paragraph of Section 4.3 states that catch basin sediment will not be sampled; Section 4.4 states that an attempt will be made to collect sediment samples from catch basins CB-1, CB-2, and CB-3. If the plan is to rely on settled solids from catch basin and line cleaning, collecting a composite of catch basin solids before system cleanout may help to ensure that ample solids volume is available to meet analytical goals. Also, if catch basin solids are presumed to be representative of only current sources, and the line solids to be representative of current and legacy sources, then analyzing catch basin solids in addition to the vactored solids from the whole system may provide useful information for understanding site sources.

4. The description of proposed line cleaning operations in Section 4.3 does not clearly state that procedures will ensure that system solids and washwater are not flushed to the municipal storm system. Any discharge of wastewater during line cleaning operations is a violation of City Code. The City recommends placement of a temporary plug in the downstream cleanout or manhole on the North Private Line to ensure that violations do not occur. Clarification in the work plan is warranted to demonstrate that line cleaning operations will protect the downstream municipal system and will not violate City Code.

5. The City disagrees with DEQ's directive to limit Site stormwater characterization to two storm events, as indicated in Section 5.1.2. This does not meet Portland Harbor Joint Source Control Strategy (JSCS) and DEQ guidance for screening the stormwater pathway and will not result in a sufficiently robust data set upon which to make source control decisions. As proposed in the previous work plan for the Site, a minimum of four sampling events should be conducted to characterize Site stormwater.

6. Section 5.1.3 suggests that samples may not be collected in accordance with JSCS storm criteria. Comparing Site data to JSCS SLVs and other lines of evidence, such as the DEQ guidance curves, requires basic commonality between data sets collected at Portland Harbor industrial sites. This is what the standard storm criteria are intended to ensure. In addition, for a site of this size and degree of imperviousness, sample collection twelve hours into the storm event will not generate data that meet the objectives of the SCE. The JSCS specifies that first-flush samples be collected within the first 30 minutes of observed runoff and that non-first flush samples be collected within the first three hours of stormwater runoff. Section 5.1.3 of the work plan warrants revision to reflect these criteria.

7. Tables 1 and 2 include methods and method reporting limits (MRLs) only for stormwater samples. Additional tables are needed to describe methods and MRLs for the stormwater solids sampling and analyses described in Section 4.3.

8. As evidenced by Table 2, proposed target MRLs are not acceptable for over half of the contaminants of interest for the evaluation. If the selected laboratory is not able to achieve reporting limits that are below the relevant SLVs for most contaminants, then a different laboratory (or laboratories) should be utilized for the analyses. Lower detection limits are achievable for most of the contaminants of interest for the site.

Thank you for providing the City with an opportunity to review this work plan. Please let me know if you need any additional information regarding these comments.

Sincerely,

Linda Scheffler
Water Resources Program Manager

Cc: Alex Liverman, DEQ
Eva DeMaria, EPA
Kim Cox, City of Portland, BES